

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Baton Rouge Breakout Facility  
Plantation Pipeline Company  
Baton Rouge, East Baton Rouge Parish, Louisiana  
Agency Interest Number: 582  
Activity Number: PER19960001  
Draft Permit 0840-00053-V0**

**I. APPLICANT:**

**Company:**

Plantation Pipe Line Company  
2200 Blount Road, Baton Rouge, Louisiana

**Facility:**

Baton Rouge Breakout Facility

The facility is located approximately 1 1/2 mile northwest of Baton Rouge, East Baton Rouge Parish, Louisiana.

Approximate UTM coordinates are 675.81 kilometers East and 3,380.51 kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS:**

Plantation Pipe Line Company is the owner and operator of Baton Rouge Breakout Facility. This facility is a combination refined petroleum products tankage facility and pumping station for the pipeline system. Facility receives liquid refined petroleum products several South Louisiana refineries and then transports those products via the interstate common carrier pipeline system. Refined petroleum products are piped to the facility where they are either temporary stored in tanks for future transport in the pipeline or transported on through the pipeline.

The facility has forty-eight (48) large "breakout" tanks for the handling of product shipments. Breakout tanks are used for short-term storage of refined petroleum products while in transit. Twenty-eight (28) of the breakout tanks are equipped with floating roofs to gasoline storage, the remaining twenty (20) are fixed roof tanks for the storage of distillate (fuels) products. There are additional smaller tanks at the facility that are used for miscellaneous purposes.

The facility was issued a minor source Permit No. 1701T dated March 4, 1982.

Also a small source Permit No. 2644 dated November 5, 1999 was issued.

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**III. PROPOSED PERMIT / PROJECT INFORMATION:**

**Proposed Permit**

A permit application and Emission Inventory Questionnaire dated July 1, 2004, requesting a Part 70 Operating Permit initial was submitted by Plantation Pipe Line Company.

**Project description**

The Baton Rouge Breakout Facility is a combination refined petroleum product breakout storage facility and pumping station for the pipeline system. Large "breakout" tanks at the facility are used to receive and temporarily store product to be transported via the pipeline system. Additional smaller tanks are used for various purposes. Twenty-eight floating-roof tanks are dedicated to gasoline, while twenty fixed-roof tanks are for storage of distillate fuels. With the CT tanks project, two additional tanks will be converted to water draw storage. In addition, miscellaneous sumps and emissions that are fugitive in nature exist at the site.

Plantation proposes to modify the facility to reconcile emission estimates from the HP5 project and by implementing the CT tanks project. Modifications include:

- Revise emissions estimates resulting from landing and subsequent re-floating of the roofs in gasoline tanks, based on emission estimation methodologies recently approved by DEQ;
- Incorporate changes due to re-evaluation of the potential emission increases associated with the HP5 project and establishing an emissions cap on HP5 affected sources; and
- Convert two fixed roof tanks, MDCT-03 and MDCT-04, to floating roof tanks to handle water draw (petroleum contact water) storage as part of the dedicated facility created by the CT Project;

Plantation originally evaluated the potential to emit (PTE) of the HP5 project to be above de minimus limits and therefore a major modification under the non-attainment NSR program using an "actual to potential" methodology. Using the 2002 API tentative methodology, Plantation has re-evaluated the potential emission increases associated with the HP5 project \*only 3.70 TPY VOC). The most significant outcome of this reevaluation is the establishment of an emissions cap for the HP5 affected sources.

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Because this application does not propose increases in emissions of PM/PM<sub>10</sub>, CO, NO<sub>x</sub>, or SO<sub>2</sub>, as part of the CT Tanks Project, PSD review is not required.

The emissions increase of VOC due to the proposed CT Tanks Project does not exceed the NNSR significance threshold rate and therefore does not require NNSR review. There were no emission increases of NO<sub>x</sub> associated with the CT Tanks Project.

Estimated changes in permitted emissions from the facility in tons per year are as follows:

Emission Summary			
Pollutant	Before	After	Change
PM10	0.32	0.32	-
VOC	1835.68	1840.30	+4.62

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	(TPY)
2,2,4-Trimethylpentane	12.43
Benzene	11.27
Ethylbenzene	2.25
n-Hexane	10.47
Methyl Tert - Butyl Ether	211.54
Toluene	16.63
Xylene	6.65
Total	271.24
Other VOC (TPY):	1569.06
Total VOC	1840.30

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**General Condition XVII Activities**

Activity	Maximum Number Annually Performed	Duration Per Activity Hourly Duration	VOC Emissions	
			lb/yr	tons/yr
Loading Tankers	120	1	6.149	3.1
		<b>Total</b>	6.149	3.1
N <sub>2</sub> Displacement	15	4	5.501	2.8
		<b>Total</b>	5.501	2.8
<b>Product Sampling and Measurement Activity</b>				
Portable Prover Calibration	6	5	482	0.24
Tank Gauging	780	0.25	185	0.09
Tank Sampling	511	0.25	121	0.061
Sample Houses	7,300	0.25	21	0.011
Automatic Samples	10	8.760	36	0.018
		<b>Total</b>	845	0.04
<b>Equipment Maintenance and Repair</b>				
Sump Cleaning	4	4	100	0.050
Launch/Receive Scrapers	33	1.5	34	0.017
Remove/Replace Valve	12	3	611	0.31
Pump Repair	12	14	1,584	0.79
Filter/Strainer Changing	6	3	272	0.14
Prover/Meter Maintenance	60	3	2,892	1.4
Check Vent on Cone Rack Tanks	39	0.5	1.9	0.001
Opening Varc Hatch	12	2	252	0.13
Seal Replacement on Pumps	36	1	185	0.09
Pig Slg Repairs	3	0.5	1.4	0.001
Corrosion Coupon Replacement	28	0.25	0.094	0.001
Drain-ups for Pipe Replacement	15	8	2,517	1.26
Instrument Maintenance	80	1	0.72	0.001
		<b>Total</b>	8,451	4.2

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**Insignificant Activities**

<b>A. Exemptions Based on Size and Rate</b>		
<b>Unit</b>	<b>Description</b>	<b>Citation</b>
IC Engine for fire pump	Diesel fueled IC engine 412 Break Horsepower	LAC 33:III.501.5.A.1.
MD Fire Diesel Tank	500 gallon capacity diesel storage tank for emergency fire pump	LAC 33:III.501.5.A.3.
MD Laboratory	On site laboratory for the analysis of product samples as part of the Plantation's product quality assurance program.	LAC 33:III. 501.5.A.6.
<b>B. Exemptions Based on Activity</b>		
<b>Activity</b>	<b>Activity Description</b>	
Tank Coating and Painting	The internal coating and external painting of the facility's storage tanks to maintain product quality and tank integrity, respectively	LAC 33:III.501.5.B.2.
Surface preparation of tanks and other facility equipment prior to painting or coating.	External pressure washing, internal sand blasting, and external sand blasting of tanks and other facility equipment prior to coating and painting. This activity is completed prior to all tank internal coating operations. External sand blasting of tank roofs and portions of shell is completed on an infrequent basis.	LAC 33:III.501.5.B.3.
Miscellaneous equipment maintenance including fabrication of replacement components.		LAC 33:III.501.5.B.3.

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**IV. Periodic Monitoring**

The Monitoring, Reporting and Recordkeeping necessary for demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit.

<b>V. Applicability and Exemptions of Selected Subject Items<sup>1</sup></b>		
MD001 through MD006, MD049, MD069, MD070, MD071, MD072, MD073, MD097 (Diesel Storage Tank))	Storage of VOC compounds LAC 33:III.2103	Does Not Apply The vapor pressure of the liquid at storage conditions is <1.5psia.
	NSPS Subpart K, Standards for Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	Does Not Apply This tank was not constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978.
	NSPS Subpart Ka, Standards for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	Does Not Apply This tank was not constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984.
	NSPS Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels 40 CFR 60.110b	Does Not Apply This tank was not constructed, reconstructed, or modified after July 23, 1984.
	MACT Subpart R, Gasoline Distribution Facilities 40 CFR 63.420	Does Not Apply This tank is not used to relieve surges or receive and store gasoline from a pipeline, therefore, this tank is not associated with a pipeline breakout station as defined in 40 CFR 63.421 -Subpart R Definitions.

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MD008*through MD019, MD083*through MD088 MD098*through MD100, (Gasoline Storage Tank)	NSPS Subpart K, Standards for Performance for Storage Vessels for Petroleum Liquids 40 CFR 60.110	Does Not Apply This tank was not constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978.
	NSPS Subpart Ka, Standards for Storage Vessels for Petroleum Liquids 40 CFR 60.110a	Does Not Apply This tank was not constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984.
	NSPS Subpart Kb, Standards for Performance for Storage Vessels for Volatile Organic Liquid 40 CFR 60.110b.	Does Not Apply This tank was not constructed, reconstructed, or modified after July 23, 1984.
MDKEROSUMP, MD074, MD089 Through MD092 MDCT-01, MDCT-02, MDCT-11 MD 18A & B SOMP (Jet Kerosene Tank)	Storage of VOC compounds LAC 33:III.2103	Does Not Apply The vapor pressure of the liquid at storage conditions is <1.5psia.
	NSPS Subpart K, Standards for Performance to Storage Vessels for Petroleum Liquids. 40 CFR 60.100	Does Not Apply This tank was not constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978; Sump Capacity is <40,000 gallons.
	NSPS Subpart Ka, Standards for Performance to Storage Vessels for Petroleum Liquids 40 CFR 60.110a	Does Not Apply This tank was not constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984; Sump Capacity is < 40,000 gallons.
	NSPS Subpart Kb, Standards for Performance to Storage Vessels for Volatile Organic Liquids 40 CFR 60. 110b	Does Not Apply This tank was not constructed, reconstructed, or modified after July 23, 1984; Sump Capacity is less than 40,000 gallons.

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<b>V. Applicability and Exemptions of Selected Subject Items<sup>1</sup></b>		
MDKEROSUMP, MD074, MD089 Through MD092 MDCT-01, MDCT-02, MDCT-11 MD I8A &B SOMP (Jet Kerosene Tank) (Continued)	MACT Subpart R, Gasoline Distribution Facilities 40 CFR 63.420	Does Not Apply This tank is not used to relieve surges or receive and store gasoline from a pipeline, therefore, this tank is not associated with a pipeline breakout station as defined in 40 CFR 63.421 –Subpart R Definitions.
MD007, MD050 through MD055 (Transmix Tank)	NSPS Subpart K, Standards for Performance to Storage Vessels for Petroleum Liquids. 40 CFR 60.100	Does Not Apply This tank was not constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978
	NSPS Subpart Ka, Standards for Performance to Storage Vessels for Petroleum Liquids 40 CFR 60.110a	Does Not Apply This tank was not constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984.
	NSPS Subpart Kb, Standards for Performance to Storage Vessels for Volatile Organic Liquids 40 CFR 60. 110b	Does Not Apply This tank was not constructed, reconstructed, or modified after July 23, 1984.
MDPCWPAD (Petroleum Contaminated Water {(PCW) PAD})	Volatile Organic Compounds – Loading LAC 33:III.2107.A.2.	Does Not Apply. The loading throughput of petroleum contaminated water is <40,000 gallons/day.
	Gasoline Bulk Plants LAC 33:III.2133	Does Not Apply The Plantation Pipeline Baton Rouge Breakout Tank Farm does not meet the definition of a Bulk Gasoline Plant because the throughput of gasoline through pipeline is >50,000 gallons.

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<b>V. Applicability and Exemptions of Selected Subject Items<sup>1</sup></b>		
MDPCWPAD (Petroleum Contaminated Water {(PCW) PAD})( contd).	Gasoline Bulk Plants LAC 33:III.2135	Does Not Apply The Plantation Pipeline Baton Rouge Breakout Tank Farm does not meet the definition of a Bulk Gasoline Plant because the throughput of gasoline through pipeline is >50,000 gallons.
	Gasoline Terminal Vapor-Tight Control Procedure LAC 33:III.2137	Does Not Apply Gasoline tank trucks do not service this equipment, nor are gasoline tank trucks loaded with this equipment.
	NSPS Subpart XX, Standards for Gasoline Terminals 40 CFR 63.500	Does Not Apply This equipment is not designed to deliver product into gasoline tank trucks.
	MACT Subpart R, Gasoline Distribution Facilities 40 CFR 63.420	Does Not Apply This tank is not used to relieve surges or receive and store gasoline from a pipeline, therefore, this tank is not associated with a pipeline breakout station as defined in 40 CFR 63.421 –Subpart R Definitions.
	MACT Subpart EEEE, Standards for Organic Liquid Distribution (OLD) Facilities (Non-gasoline) 40 CFR 63.2330	EXEMPT Petroleum Contaminated Water (PCW) transfer through loading equipment contains less than 25% organic HAP.

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MDSEP-1, MDSEP- 2, MDSEP- 3 (Oil/Separator)	Oil Water – Separation LAC 33:III.2109	EXEMPT. This sump separates less than 200 gallons per day. This sump only used for maintenance activity. Recordkeeping requirements apply.
	NSPS Subpart K, Standards for Performance for Storage Vessels for Petroleum liquids 40 CFR 60.110	Does Not Apply Capacity is <40,000 gallons
	NSPS Subpart Ka Standards for Performance for Storage Vessels for Petroleum liquids 40 CFR 60.110a	Does Not Apply Capacity is <40,000 gallons
	NSPS Subpart Kb, Standards for Performance for Storage Vessels for Volatile Organic Liquids. 40 CFR 60.110b	Does Not Apply Capacity is 75 m <sup>3</sup> .
	MACT Subpart R, Gasoline Distribution Facilities 40 CFR 63.420	Does Not Apply This tank is not used to relieve surges or receive and store gasoline from a pipeline, therefore, this tank is not associated with a pipeline breakout station as defined in 40 CFR 63.421 –Subpart R Definitions.
MDF2 (Process Fugitives) MDHP5FUG (HP5 Project Fugitives)	Fugitive Emission Control LAC 33:III.2122.	Does Not Apply This facility is not an affected facility, which is a petroleum refinery, a natural gas processing plant, the synthetic organic chemical manufacturing industry (SOCMI), the MTBE manufacturing industry, and the polymer manufacturing industry.

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<b>V. Applicability and Exemptions of Selected Subject Items<sup>1</sup></b>		
MD 157 (Jet Kerosene Storage Tanks)	NSPS Subpart Ka Standards for Performance for Storage Vessels for Petroleum liquids 40 CFR 60.110a	Does Not Apply Capacity is <40,000 gallons
MDIT-01, MDIT-02 (Tank Corrosion Inhibitor Tanks)	Gasoline Bulk Terminals LAC 33:III.2135	Does Not Apply The vapor pressure of the liquid at storage conditions is 1.5 psia

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**VI. Glossary**

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H<sub>2</sub>S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

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Nitrogen Oxides (NO<sub>x</sub>) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub>- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.